

Exhibit E

Jason Daniel Armenta

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
MICHELLE YVETTE AMIN, et al.,

**AFFIDAVIT OF
JASON DANIEL ARMENTA**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF OREGON)

: SS.:

COUNTY OF YAMHILL)

JASON DANIEL ARMENTA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 14601 NW Pheasant Hill Road, McMinnville, Oregon 97128.

2. I am currently 52 years old, having been born on June 4, 1970.

3. I am the son of Daniel Victor Armenta, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from metastatic bladder cancer on November 25, 2013. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. Unfortunately, my father was not involved much in my life growing up. My parents divorced when I was young, and I moved with my mother. I reconnected with my father after I had my first child. It was important to me that my children have their grandfather in their lives. We spent a lot of time reconnecting and learning about each other. We grew close, and I got to meet my half-siblings and stepmother. They all got to meet my daughters. Our

relationship was great once we reconnected. I would go to their house and have meals with them. I moved to Oregon, which made it difficult to see each other, but our relationship remained good until the end.

6. My father was a proud firefighter and a huge part of his community. He was a part of the San Francisco crew that went to New York in the aftermath of the attacks. This crew played a role in the search and rescue and clean-up at the World Trade Center site. My father didn't hesitate to be there. He went because he knew it was the right thing to do. I don't know any particular details about his experiences at the WTC site. He only talked about his need to go and the camaraderie he witnessed there.

7. My father was full of life and an athlete well into his 60's. It was a shock when I found out he was sick. He called me and didn't want to discuss the kids like we usually do. Instead, he told me he had cancer. He said it was a rare form of cancer he believed he got from his time at the WTC site. He told me one of the other firefighters from his house that was also in New York had gotten the same cancer. It could not be a coincidence.

8. I was not involved much in caring for my father during his illness. He would always put on a brave face and portray strength for me. I think he didn't want to worry me. I would have been there for him despite living in a different state. He was self-sufficient in his care.

9. Everything with my father's illness seemed to happen very quickly. It was devastating. We were robbed of the chance to reconnect on another level. We were deprived of the opportunity for him to be a part of my daughters' lives as adults. It sticks with me that my daughters will never get to know their grandfather on a level they should. He won't be there for their milestones. Now they have to learn of their grandfather through stories from me. My father was too young and taken too fast.

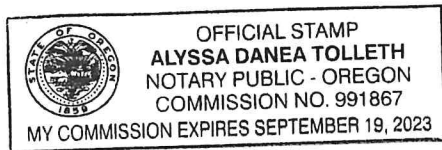
10. He was a pretty amazing guy. Anyone who knew him would say the same thing. He was known in the fire community as the guy who was always there. He was reliable and always willing to help. It didn't surprise me when he went to New York. That's the kind of guy he was. As tough as it is, I am proud that he went. That's who he was, and I would not have

expected anything less.


JASON DANIEL ARMENTA

Sworn to before me this
12 day of June, 2022

July SDA
Alyssa D. Tolleth
Notary Public



Barbara Bova

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
MICHELLE YVETTE AMIN, et al.,

**AFFIDAVIT OF
BARBARA BOVA**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF SULLIVAN)

BARBARA BOVA, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 4 Kent Street, Rock Hill, New York 12775.

2. I am currently 58 years old, having been born on July 25, 1963.

3. I am the wife of Ralph James Bova, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My husband passed away from prostate cancer on June 5, 2011. It was medically determined that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. Before I met Ralph, many things in my life were not going well. He changed my life completely. I was so blessed to be married to him. It was a pleasure, blessing, and honor to be around him. He called me "my Barbara," and I called him "my Ralph." I had never felt so safe and happy until I met him. We were inseparable. When we went shopping, he would carry my bags for me. We loved to go for long car rides and take leisurely walks. He would write

poetry for me and buy me presents for no particular reason. He was my best friend. Just having my Ralph was everything.

6. On 9/11, Ralph worked as a court officer at 100 Centre Street in Manhattan. He witnessed both planes crash into the towers and knew we were under attack. He knew he had to represent the court officers and did so by helping people evacuate during the attacks. Ralph would've done anything to help anyone. He stayed for several days after the attacks as a part of the search and rescue. He was taking blood pressure medication at the time, but he didn't have it on him as he didn't plan to stay for so long. At one point, he had to be taken to the hospital due to his blood pressure, but even that didn't stop him. He returned to the site to continue to help.

7. Ralph had a beautiful singing voice before 9/11. After 9/11, his voice became raspy, and he lost his ability to sing. His eyes would often become watery. He began to have back pain, which he thought was sciatica. Ralph visited his chiropractor, who could not help him with his pain. He went to another doctor for further testing. The doctor asked to see us both after the testing to reveal the results. He told us that Ralph had prostate cancer that had already spread through the bone. After that, it was a flurry of doctor appointments and chemotherapy treatments, all of which I attended with him. I was constantly by his side, right up until the end.

8. Ralph's condition deteriorated quickly. After a while, I had to do everything for him, as he couldn't do anything for himself. He was in constant pain, but he always tried to minimize it for me so I wouldn't be upset. But I knew. He was heart and soul, and I wished I could take away his pain and cancer. During his illness, I did my best to be strong for him, but I felt as if I were dying in my alone moments.

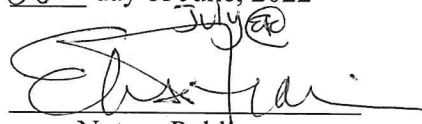
9. My Ralph was my world, my life, my everything, and more. I suffer every day from his loss. My heartache worsens with each passing day. Without him, I feel like I am just breathing, just existing. I am not truly "living" without him. I miss him terribly. I feel as if there is a gaping hole in my heart, and it gets bigger and bigger. I cry every day, several times a day, over my Ralph.

10. He was a lovely man. Everyone loved him. He had a wonderful sense of humor and a kindness about him. There was not a mean bone in his body. He was a true gentleman. He was an opera singer and had a beautiful voice. If you were lucky enough to come in contact

with Ralph, your day was brighter. I thank God for the time he gave me with my Ralph. I am lost without him.


BARBARA BOVA

Sworn to before me this
20th day of ~~June~~ ^{July}, 2022


Notary Public

ELISA FRANCOIS
Notary Public, State of New York
NYS Reg. No. 01FR6041796
Qualified in Sullivan County
Commission Expires May 15, 2026

Donald J. Buck

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
MICHELLE YVETTE AMIN, et al.,

**AFFIDAVIT OF
FLORENCE E. HOOSEIN ON
BEHALF OF THE ESTATE OF
DONALD J. BUCK**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW JERSEY)
 : SS.:
COUNTY OF MONMOUTH)

FLORENCE E. HOOSEIN on behalf of the estate of DONALD J. BUCK, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 27 Locust Avenue, Red Bank, New Jersey 07701.

2. I am the sister of Rebecca A. Buck, upon whose death my claim is based. My father, Donald J. Buck, died on September 24, 2016, prior to the commencement of this action, and his estate was a plaintiff herein. At the time this action was commenced, my mother, Ruth E. Buck, was my father's estate representative. However, she died on October 6, 2021. Due to my mother's death, I am now the proposed estate representative for my father, Donald J. Buck's estate.

3. Accordingly, I submit this affidavit on behalf of my father Donald J. Buck's estate in connection with the pending motion for a default judgment and in support of his solatium claim.

4. My sister and Donald's daughter, Rebecca A. Buck, passed away from metastatic breast cancer on July 21, 2015, at the age of 44. It was medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. My dad had three daughters, and he was close with all three of us. Rebecca was his little girl. They had a close relationship as well. He loved his daughters dearly. I used to live next door to my parents in New Jersey, and Rebecca lived in New York. Rebecca would come down for weekends and holidays. We would sit up with my dad all night long, talking about anything and everything. She would go camping with him, fishing with him—we didn't even have to do anything to have a good time. We would all sit around the kitchen table and talk. We loved to all spend time together.

6. In September 2001, Rebecca worked as a Sergeant for the New York Police Department. She responded to the World Trade Center site to participate in rescue and recovery immediately following the 9/11 attacks. She was working down there for months. In 2001, I lived in New Jersey next door to my parents, and Rebecca lived in New York. We were a close family; we talked every day. Rebecca would come down to Ocean Grove, NJ, where we lived, on the weekends. When we learned that Rebecca was participating in the Ground Zero clean-up, we didn't realize the impact that the toxic exposure would have on her. We were told that FEMA cleared the area, so we thought it was safe.

7. When Rebecca was diagnosed with cancer in 2012, she didn't want our father Donald to know that she had cancer. Our father was older and fragile, so she thought the news would affect him too much. He also had short-term memory loss. I remember one night shortly after her diagnosis, my mother and I were speaking about Rebecca (who was not present). We were talking about Rebecca being so sick, and my father was saddened to learn how sick she was. Over the next few days, he kept repeating, "Rebecca is very sick." Rebecca was very upset when she found out our dad knew that she was sick.

8. Rebecca's illness had an emotional impact on our father Donald. He internalized the hard truth about Rebecca's illness, but he didn't want to talk about it. He would talk about it a little, and he would get very sad. I never brought up her cancer diagnosis in front of him because Rebecca would be upset if he found out. Our dad spent as much time around Rebecca

as possible. He couldn't care for her physically because he was too frail, but he would always sit at the table with Rebecca and talk to her when he could.

9. We were blindsided as a family by Rebecca's death. There was no time to prepare, in the end her condition rapidly worsened, and she was gone within forty-eight hours. Our father was very ill at the time of Rebecca's death. This wasn't supposed to happen, Rebecca should be here enjoying her life. She was our hero. She was taken away too soon. Rebecca wanted to be here, and we wanted her here, especially our parents. My dad, Donald, lived more than a year after losing his daughter, Rebecca.



FLORENCE E. HOOSEIN on behalf
of the estate of DONALD J. BUCK

Sworn to before me this
27th day of July, 2022



Notary Public

MELISSA L ROBINSON
Notary Public
State of New Jersey
My Commission Expires Dec. 7, 2023
I.D.# 50095128

Ruth E. Buck

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
MICHELLE YVETTE AMIN, et al.,

**AFFIDAVIT OF
FLORENCE E. HOOSEIN ON
BEHALF OF THE ESTATE OF
RUTH E. BUCK**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW JERSEY)

: SS.:

COUNTY OF MONMOUTH)

FLORENCE E. HOOSEIN on behalf of the estate of RUTH E. BUCK, being duly sworn,
deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 27 Locust Avenue, Red Bank, New Jersey 07701.
2. I am the sister of Rebecca A. Buck, upon whose death my claim is based.
3. My mother, Ruth E. Buck, was also a plaintiff in the within action and was pursuing her own solatium claim based on the illness and death of her daughter, Rebecca A. Buck.
4. Ruth passed away on October 6, 2021, after the commencement of the within action.
5. I am the proposed representative of my mother's estate. Accordingly, I submit this affidavit on my mother Ruth E Buck's behalf in connection with the pending motion for a default judgment and in support of her solatium claim.

6. My sister and Ruth's daughter, Rebecca A. Buck, passed away from metastatic breast cancer on July 21, 2015, at the age of 44. It was medically determined that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

7. Rebecca was the baby of the family. She and my mother had a great relationship, where they could talk about anything. She always went to my mother for advice. We would go to our mother for advice on family, relationships, and career. Our mother encouraged Rebecca to become a police officer. That was the start of Rebecca's career. She also gave her advice about buying properties and starting her own business.

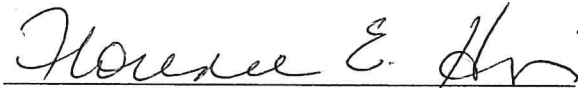
8. In September 2001, Rebecca worked as a Sergeant for the New York Police Department. She responded to the World Trade Center site to participate in rescue and recovery immediately following the 9/11 attacks. She was working down there for months. In 2001, I lived in New Jersey next door to my parents, and Rebecca lived in New York. We were a close family; we talked every day. Rebecca would come down to Ocean Grove, NJ, where we lived, on the weekends. When we learned that Rebecca was participating in the Ground Zero clean-up, we didn't realize the impact that the toxic exposure would have on her. We were told that FEMA cleared the area, so we thought it was safe.

9. When Rebecca was diagnosed with breast cancer in 2012, she had just retired from the NYPD. She wanted to start a new career as a nurse and had just been accepted into nursing school. She was only 41 years old when she was diagnosed. Rebecca had to stop her schooling immediately to start treatment, and she was very disappointed. Our mother was saddened. We found out right away—Rebecca called us right away as soon as she was diagnosed.

10. Our mother, Ruth, provided emotional support for Rebecca during her illness. She would go see Rebecca in the hospital during her stays. My sister tried alternative therapies because she didn't want chemotherapy or radiation. She went back and forth to an alternative cancer treatment center in Germany about ten times. My mother went with her once. My daughter accompanied her the other times. When Rebecca became ill, she came to visit me and never went back to New York. She didn't want to be alone and wanted to be with family.

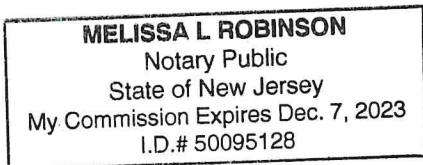
11. Rebecca's illness had a heavy emotional impact on our mother Ruth. No one thought that Rebecca was going to get sick and pass away so quickly. We were worried about Rebecca from the moment she was diagnosed, but we always had hope. Rebecca would say to our mother, "I just want to go into remission." At a point they spoke about Rebecca dying and her arrangements, and that is not a conversation anyone should have to have with their child. Rebecca died within three years of her initial diagnosis. After Rebecca's death, my mother was saddened that she never got to hear Rebecca say that she was in remission. We were blindsided as a family by Rebecca's death. There was no time to prepare, and in the end her condition rapidly worsened and she was gone within forty-eight hours.

12. Parents aren't supposed to see their children die. Our mother Ruth grieved for her daughter immensely, and she wasn't the same after Rebecca's death. Sometimes, we would try to talk about Rebecca, but it was very hard for my mother to speak about her youngest child after she passed. There were times after Rebecca's death where my mother would wake up from her sleep and say, "I wish I could go back to my dream, because Rebecca was there." I can't imagine how much my mother suffered in the last six years of her life. My mother suffered in silence. Our family was fractured and never the same after Rebecca's death.


FLORENCE E. HOOSEIN on behalf
of the estate of RUTH E. BUCK

Sworn to before me this
27th day of July, 2022


Notary Public



Elizabeth Ruth Gutierrez

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
MICHELLE YVETTE AMIN, et al.,

**AFFIDAVIT OF
ELIZABETH RUTH
GUTIERREZ**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW JERSEY)

: SS.:

COUNTY OF MONMOUTH)

ELIZABETH RUTH GUTIERREZ, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 245 Bay Avenue, Leonardo, New Jersey 07737.
2. I am currently 62 years old, having been born on June 13, 1960.
3. I am the sister of Rebecca A. Buck, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. Rebecca passed away from breast cancer on July 21, 2015. It was medically determined by the World Trade Center Health Program that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. There was a 10-year age gap between Rebecca and me. This never prevented us from being close. We were a very close-knit family. I loved her dearly. When she was a toddler, I helped care for her and was often in charge of dressing her. As she grew older, we enjoyed doing each other's makeup and modeling different outfits. As adults, we remained close. I admired her greatly for choosing to become a Police Officer.

6. Rebecca was a first responder on 9/11. She was there to help as many people as she could. Rebecca stayed for months to help with the search and rescue and cleanup. She didn't share much else with me, as she didn't want to upset me.

7. Due to my bipolar disorder, my family hid Rebecca's illness from me for a long time. I realized something was wrong with her when I was visiting her in the hospital and saw that she had lost the ability to move her right arm.

8. I tried to be there for my sister as much as possible. There were times I would drive in from New Jersey to take her to see a specialist in Manhattan. I would buy her food and try to encourage her to eat. I helped care for her dogs. Mostly, I sat with her and kept her company. I was my sister's emotional support as much as I could be. I loved her and would do anything for her.

9. The emotional impact of my sister's illness and loss is something I still struggle with. I never got over her passing at such a young age. She was my baby sister, and she was dear to me. Her loss was tremendous. I still bring flowers to her grave regularly. I miss talking to her daily. I miss her every day. She was so beautiful, and her death at a young age is such a loss. It has been devastating.

10. Rebecca's illness had a tremendous impact on my family and on Rebecca herself. She did not want to die. She stopped being herself. She lost her happiness and became worried about everything. She worried about her family and her dogs. I watched my mother grieve and saw how hard it was on her. Our loss is tremendous. We still suffer to this day.


ELIZABETH RUTH GUTIERREZ

Sworn to before me this
30th day of June, 2022


Notary Public



Florence E. Hoosein

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

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MICHELLE YVETTE AMIN, et al.,

**AFFIDAVIT OF
FLORENCE E. HOOSEIN**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
-----X

STATE OF NEW JERSEY)
: SS.:
COUNTY OF MONMOUTH)

FLORENCE E. HOOSEIN, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 27 Locust Avenue, Red Bank, New Jersey 07701.

2. I am currently 55 years old, having been born on February 9, 1967.

3. I am the sister of Rebecca A. Buck, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. Rebecca passed away from breast cancer on July 21, 2015, at the age of 44. It was medically determined by the World Trade Center Health Program that this illness was causally connected to her exposure to the toxins resulting from the September 11, 2001, terrorist attacks.

5. Rebecca and I were very close growing up, as there was not a significant age gap between us. Adulthood only brought us closer. She would often visit me in New Jersey, and we always had a great time. We would spend hours and hours just sitting and talking. We spent as many holidays together as her job allowed, and we would go on vacations together.

6. Rebecca was among the brave men and women charging towards danger as many were running away on 9/11. She volunteered to be there, wanting to help all she could. She worked many long hours and stayed at the World Trade Center site for many months. She did her duty as part of the search and rescue team and eventually assisted with the cleanup.

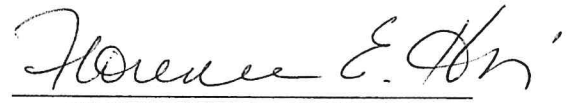
7. I learned of Rebecca's illness early on. She had called me to tell me she had discovered a lump in her breast. I advised her to see a doctor as soon as possible. She did, and the doctor performed a biopsy. It was discovered that she had a rare and aggressive form of breast cancer. Rebecca wanted to hide her illness from our father due to his advanced age and declining health. She wanted to do the same for our sister, Elizabeth, due to her bipolar disorder. My mother and I kept Rebecca's secret for her.

8. Rebecca lived with me during her battle with cancer. She didn't want to be alone. She wanted to be with family. I was happy to be there for her. I was with her all the time. I would take her to her medical appointments. She was strong and independent and wanted to do as much as she could for herself, but I helped her along the way. Toward the end, I would help her with the little tasks, caring for her dog, and so on. No one knew how sick she was and how fast she would go.

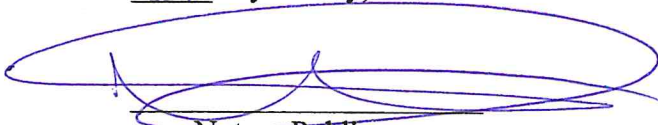
9. It's hard to give justice to the impact of losing my sister. She was only 44 years old and supposed to grow old with me. She was snuffed out at such an early age. I miss her terribly. She should be here to meet my grandchildren, who she so looked forward to meeting. I lost a best friend and confidant. I would do anything to have her here. To have one last conversation with her. It's been seven years, and the wound still has not healed. You learn how to deal with and live on with the pain, but it does not ever go away.

10. Rebecca was our hero. She was the first one in our family to become a Police Officer. We watched her move up the ranks and could not have been prouder of her. She was strong and kind. She volunteered whenever she could. I can't say enough kind words about her. She was always willing to help. She was kind, generous, giving, and loving. There is a hole in my heart where she is supposed to be. Our family is fractured and will never be the same

without her. I will grieve for my sister until the day I die.


FLORENCE E. HOUSEIN

Sworn to before me this
27th day of July, 2022


Notary Public



Donna Marie Martinelli

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
MICHELLE YVETTE AMIN, et al

AFFIDAVIT OF
DONNA MARIE MARTINELLI

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NORTH CAROLINA)
 : SS.:
COUNTY OF MECKLENBURG)

DONNA MARIE MARTINELLI, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 10209 Elizabeth Crest Lane, Charlotte, NC 28277.

2. I am currently 52 years old, having been born on November 8, 1969.

3. I am the daughter of Joseph Patrick Cassella, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father passed away from pulmonary fibrosis and interstitial lung disease on October 16, 2016. It was determined by the World Trade Center Health Program that these illnesses were causally connected to his exposure to the toxins resulting from the September 11, 2001 terrorist attacks.

5. My parents divorced when I was very young, and my mother kept me from my father for a long time. I would sneak in phone calls to him when I was a kid. As I grew older, my father and I started to have a beautiful relationship. He was the best father a girl could ask for. My brother and I meant everything to my dad. We were his only family. He never married after he divorced my mother. When I had children, he was always there to help take care of

them. He was just wonderful.

6. My father worked for the City of New York as a mason. His office was in Manhattan, right by the 59th Street bridge. On September 11, 2001, he was at his office when he learned that the World Trade Center had been attacked. He rushed down to help. He assisted with rescue and recovery efforts for the first few weeks and then worked to repair and rebuild the towers for months on end. He was probably working at Ground Zero for six to nine months. The conditions affected him greatly, and he knew what he was breathing in wasn't safe. But what affected him the most was the sadness. It was difficult for him, the emotional toll of searching for bodies.

7. In 2017, my dad got a case of what he thought was bronchitis. He didn't think much of it as it was just a bad cough. He went to the doctor, came home, and told me he had Chronic Obstructive Pulmonary Disease (COPD). I did my research on COPD and called his doctor. The doctor told me that my dad didn't have COPD, he had terminal pulmonary fibrosis and he didn't want me to know. He said my dad had a two-and-a-half-year life expectancy. I was completely shocked. My dad had only just retired, and now he wouldn't even have three years left to live. He worked his whole life for retirement, and he wanted to spend his time with his kids and grandkids.

8. My dad went to physical therapy to help with the pulmonary fibrosis. He took many medications, and he was diligent about taking them at the same time each day. Later, he had to go on oxygen. He didn't need it all the time at first, and he became more reliant on the oxygen over time. There were tubes all over the house and oxygen tanks in every room. Our lives became very stressful trying to take care of him from a distance. I was living in North Carolina, and my dad was living in New York. I remember the last time I took my kids to visit my father. It was a few months before he died. I realized then that they would probably never see their grandfather again. The thought of it hurt me beyond words. My dad became very depressed in the last year of his life, especially after the doctors gave him a six-month prognosis.

9. Within a week of my last visit to my father's home with my kids, I got a call from the hospital. My father had passed out from a lack of oxygen and the nurses needed to resuscitate him. They said if he kept coming back to the hospital, they would keep on needing to

resuscitate him. So, I signed a DNR. They sent him home with hospice care during the week, and that continued for a few more months. In October, the doctors told me he would definitely make it through December. I knew it would be our last holiday together, and I wanted to make it truly special. I couldn't wait to see him. That Sunday, October 16th, he called out to his neighbor, saying he couldn't breathe. His neighbor knew I had signed a DNR, and she called the hospice nurses to my father's home. He died that day. By the time the nurses were able to call me, my father had already been dead for two minutes.

10. The night before my father died, he called me and told me that he carried a lot of guilt for not being there for my brother and me when we were younger. I said he was still the best dad in the world. When he passed away, I felt like I was orphaned. I don't think much about that time in my life, and I try to block it out of my mind. It was like the Twilight Zone. Knowing that he was struggling to breathe until the very end, I had so much guilt around that. I also felt guilty for signing a DNR. In the end, I just couldn't believe he was gone and that it all happened so quickly.

11. My father was a very hard worker, and he was very compassionate. He cared about everyone around him. He was just such a generous soul. His funeral service was packed. Even the mailman, who hadn't been on the route by my father's home in seven years, came to his memorial service. My father meant everything to me. I am remarrying in June, and there will be an empty seat for him.

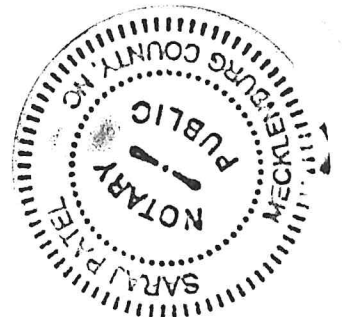
Donna Marie Martinelli
DONNA MARIE MARTINELLI

Sworn to before me this
23 day of April, 2022



Notary Public

My Commission Expires
December 9, 2025



Patrick James Coyne

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
MICHELLE YVETTE AMIN, et al

**AFFIDAVIT OF
PATRICK JAMES COYNE**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF NEW YORK)
 : SS.:
COUNTY OF SUFFOLK)

PATRICK JAMES COYNE, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 12 Weathervane Way, Dix Hills, NY 11746.

2. My current age is 28, having been born on July 26, 1993.

3. I am the son of Ronald Thomas Coyne, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My father died from respiratory disease on June 25, 2013 at the age of 45. It was determined by the World Trade Center Health Program that my father's illness was causally connected to his exposure to the toxins resulting from the 9/11 terrorist attacks.

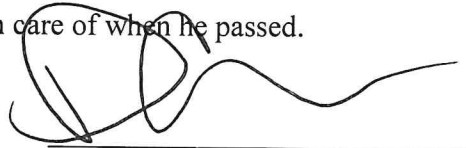
5. He was extremely involved in our lives. As a kid, I remember playing outside with my father and spending tons of time together. Whenever he wasn't working, he would take me, my brother, and my sister anywhere we wanted or needed to go. I remember he had way more vitality before September 11, 2001, and before the start of his illness. When he became sick, he lost any extra energy he had outside of his work.

6. My father was an EMT for the FDNY. On September 11, 2001, he got about as close to a skyscraper collapsing on top of you as you can get. He didn't come home until the next day. Until that point in my life, I had never seen my father break down, cry, lose his bearings the way he did the second he walked in the door. I remember him falling to the ground and hugging all of us, he was shaking. He was totally destroyed, physically and mentally.

7. I certainly knew that something was wrong with my dad after 9/11, but I didn't really understand what it was. As the years went on, he started to see more specialists and doctors. My mother passed on the information to me that my father had crystals embedded in his lungs, exposure to jet fuel, exposure to human remains, and exposure to asbestos at the World Trade Center site. As time passed, we became more aware of what he was exposed to. Not only did we learn about it, we watched the impact of all his exposure take a toll on his health day by day.

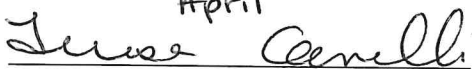
8. All of it hurts; it always hurt to have to see him like that. It was especially painful because he still worked as much as he could to support his family. He picked up extra paramedic jobs until the day that he died. At that point, we rarely ever got to see him. We would see him maybe one or two days throughout the week. It definitely took a toll on all of us. We all knew he was going to pass away, we just didn't know when. There was this looming thought that he was going to die, and we were all waiting for it to happen.

9. We lost so much time together. I didn't really get to see him. He forced himself to work so much so that his family would be taken care of when he passed.



PATRICK JAMES COYNE

Sworn to before me this
10 day of ~~March~~ April, 2022



Notary Public

TERESA CARVELLI

Notary Public, State of New York

No. 01CA6209900

Qualified in Nassau County

Commission Expires in August 3, 2025

Theresa Hazel

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
MICHELLE YVETTE AMIN, et al

**AFFIDAVIT OF
THERESA HAZEL**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.
-----X

STATE OF NEW YORK)
 : SS.:
COUNTY OF NASSAU)

THERESA HAZEL, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 286 Park Avenue, Merrick, NY 11566.

2. I am currently 55 years old, having been born on November 12, 1966.

3. I am the sister of Ronald Thomas Coyne, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.

4. My brother died from respiratory issues and pancreatitis on June 25, 2013. He was only 45 years old. Ronald's illness was already determined to be causally related to his exposure to toxins resulting from the 9/11 terrorist attacks.

5. Ronald and I grew up as three of twelve children in one house. Our mother and our aunt raised us together alongside all of our cousins. There were ten girls and two boys, and Ron was the younger boy. He was like the "prince." It was an unconventional childhood. We were close in age, but always competitive. We had a good relationship. As we grew up, we both had busy lives. We didn't see each other very often, but we got together as a family for holidays and special occasions.

6. Ronald responded to the World Trade Center on September 11, 2001 as an FDNY EMT. I found out on 9/12/2001 that not only did he respond to the WTC, but that he had to run for his life as the towers came down. He jumped into a van which protected him when the debris was raining down all around him. He was covered in soot and dust from all the materials. I know it was a traumatic experience for him. I remember he told me that he was separated from his EMT partner, and it was a heart wrenching experience when they were finally reunited. And it wasn't just bad for him—it was bad for all his friends and colleagues who suffered through it as well.

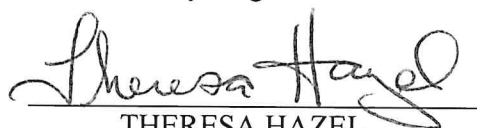
7. I learned of Ron's illness through his wife, Judy. I didn't notice that he was sick at first. But she told me that he wasn't doing so well. Upon a closer look, I could see that he was truly sick. Every next time we got together for a holiday or birthday, he would look thinner and paler. I would talk to him, and each time he would have less and less energy to hold a conversation. He would be at a family party with a bunch of family members, yet it seemed like mentally he was removed. It was like he was there all by himself. It hurt to see that.

8. I cried a lot. I didn't know how to help him. It was so sad to see him work so hard and not be able to retire. Everyone looks forward to retirement, and I could tell that wasn't going to happen for Ron.

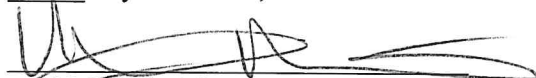
9. September 11th affected so, so many lives. The people who were there on the day it happened suffered the worst. I can't imagine what those responders saw for weeks on end. Digging through the rubble, praying that they could still find someone alive. The ones who worked in the clean-up came out shell-shocked on the other side. It was traumatic for everyone involved.

10. I think, when you sign up for the FDNY or EMT, you sort of know what you're getting yourself into. But this was so different. No one was prepared for what happened on 9/11. I think that someone like my brother Ron, who was an EMT, could've never have anticipated

that this would happen to him. It disturbed him mentally and emotionally for the rest of his life.
And it was so painful for me to see my brother suffer and die so young.


THERESA HAZEL

Sworn to before me this
31st day of March, 2022


Notary Public

UYEN NGUYEN
NOTARY PUBLIC-STATE OF NEW YORK
No. 01NG6293336
Qualified in Bronx County
My Commission Expires December 09, 2025

Michael Anthony D'Errico

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In Re:

TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

03-MDL-1570 (GBD)(SN)

-----X
MICHELLE YVETTE AMIN, et al.,

**AFFIDAVIT OF
MICHAEL ANTHONY
D'ERRICO**

Plaintiffs,

20-CV-00412 (GBD)(SN)

v.

ISLAMIC REPUBLIC OF IRAN,

Defendant.

-----X
STATE OF FLORIDA)
 : SS.:
COUNTY OF LAKE)

MICHAEL ANTHONY D'ERRICO, being duly sworn, deposes and says:

1. I am a plaintiff in the within action, am over 18 years of age, and reside at 2422 Woodward Hill, Clermont, Florida 34711.
2. I am currently 35 years old, having been born on August 2, 1986.
3. I am the son of Nicholas D'Errico, upon whose death my claim is based, and submit this Affidavit in connection with the pending motion for a default judgment and in support of my solatium claim.
4. My father passed away from bladder cancer on February 8, 2015. It was medically determined by the World Trade Center Health Program that this illness was causally connected to his exposure to the toxins resulting from the September 11, 2001, terrorist attacks.
5. My parents were my go-to for everything in my life. My father and I loved working on cars and our house together. We also enjoyed taking road trips. My dad provided a sense of security in my life. My relationship with my father meant the world to me and then some.

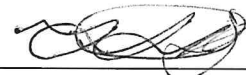
6. My father responded to the World Trade Center site on 9/11. He was an audio engineer for NBC News, and he had to report to the scene as the attacks were occurring. He worked 15-to-17-hour days at the World Trade Center site for months on end. I remember him coming home covered in ash and dust. He witnessed the collapse of 7 WTC firsthand. He kept telling us about the smoke, which went on for months after the attacks occurred.

7. Years later, I was home with my father for Christmas when I realized he looked different. He looked in a way that I had never seen him before. I knew something was seriously wrong with his health, but I didn't know what. Right after Christmas, he broke the news to my brother and me that he had bladder cancer and that he was going to fight it. He was optimistic and wanted to stay strong.

8. I carry a lot of guilt for moving to Florida during my father's illness. I was preparing to move before he found out he was sick, and he insisted that I move anyway. He was the structure of my entire life, and I tried to emulate him as best I could. Seeing him suffer destroyed me. When I was still in New York, I would take him to his cancer treatments. When I returned from Florida to visit him while he was sick, I completely broke down. It was very difficult watching my father succumb to his illness. The quality of my work suffered due to the mental burden of my father's illness.

9. My father was a big believer in holistic medication, so I did a lot of research for him and tried to find the best holistic treatments. I called him every day to provide emotional support. The day my father died, I drove up from Florida to say goodbye to him.

10. My father was an ethical person and a man of strong morals. I've never seen anyone live those attributes the way my father did. He gave me something to strive for. I'll never forget his wake—there were lines out the door of people wanting to pay their respects.



MICHAEL ANTHONY D'ERRICO

Sworn to before me this
2nd day of June, 2022



Notary Public